

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EDGEWOOD HIGH SCHOOL
OF THE SACRED HEART, INC.,
Plaintiff,

v.

CITY OF MADISON, WISCONSIN;
CITY OF MADISON ZONING BOARD
OF APPEALS; CITY OF MADISON
PLAN COMMISSION; and CITY OF
MADISON COMMON COUNCIL;
Defendants.

Case No. 3:21-CV-118

DECLARATION OF SARAH A. ZYLSTRA

I, Sarah A. Zylstra, under penalty of perjury, declare as follows:

1. I am an attorney representing the Defendants in the above-reference matter. I offer this declaration in support of Defendants' motion for summary judgment.

2. Attached to this Declaration as Exhibit A is a true and correct copy of Deposition Exhibit 7, marked at the deposition of George Hank taken on April 27, 2022.

3. Attached to this Declaration as Exhibit B is a true and correct copy of Deposition Exhibit 13, marked at the deposition of George Hank taken on April 27, 2022.

4. Attached to this Declaration as Exhibit C is a true and correct copy of Deposition Exhibit 18, marked at the deposition of Tag Evers taken on April 28, 2022.

5. Attached to this Declaration as Exhibit D is a true and correct copy of Deposition Exhibit 55, marked at the deposition of Michael Elliot taken on May 10, 2022.

6. Attached to this Declaration as Exhibit E is a true and correct copy of Deposition Exhibit 54, marked at the deposition of Michael Elliot taken on May 10, 2022.

7. Attached to this Declaration as Exhibit F is a true and correct copy of Deposition Exhibit 57, marked at the deposition of Michael Elliot taken on May 10, 2022.

8. Attached to this Declaration as Exhibit G is a true and correct copy of Deposition Exhibit 59, marked at the deposition of Michael Elliot taken on May 10, 2022.

9. Attached to this Declaration as Exhibit H is a true and correct copy of Deposition Exhibit 72, marked at the deposition of Michael Elliot taken on May 10, 2022.

10. Attached to this Declaration as Exhibit I is a true and correct copy of Deposition Exhibit 61, marked at the deposition of Michael Elliot taken on May 10, 2022.

11. Attached to this Declaration as Exhibit J is a true and correct copy of Deposition Exhibit 64, marked at the deposition of Michael Elliot taken on May 10, 2022.

12. Attached to this Declaration as Exhibit K is a true and correct copy of Deposition Exhibit 62, marked at the deposition of Michael Elliot taken on May 10, 2022.

13. Attached to this Declaration as Exhibit L is a true and correct copy of Deposition Exhibit 65, marked at the deposition of Michael Elliot taken on May 10, 2022.

14. Attached to this Declaration as Exhibit M is a true and correct copy of Deposition Exhibit 66, marked at the deposition of Michael Elliot taken on May 10, 2022.

15. Attached to this Declaration as Exhibit N is a true and correct copy of Deposition Exhibit 37, marked at the deposition of Matthew Tucker taken on April 29, 2022.

16. Attached to this Declaration as Exhibit O is a true and correct copy of Deposition Exhibit 6, marked at the deposition of George Hank taken on April 27, 2022.

17. Attached to this Declaration as Exhibit P is a true and correct copy of Deposition Exhibit 3, marked at the deposition of George Hank taken on April 27, 2022.

18. Attached to this Declaration as Exhibit Q is a true and correct copy of Deposition Exhibit 1, marked at the deposition of George Hank taken on April 27, 2022.

19. Attached to this Declaration as Exhibit R is a true and correct copy of Deposition Exhibit 70, marked at the deposition of Michael Elliot taken on May 10, 2022.

20. Attached to this Declaration as Exhibit S is a true and correct copy of Deposition Exhibit 71, marked at the deposition of Michael Elliot taken on May 10, 2022.

21. Attached to this Declaration as Exhibit T is a true and correct copy of Deposition Exhibits 9 and 11, marked at the deposition of George Hank taken on April 27, 2022.

22. Attached to this Declaration as Exhibit U is a true and correct copy of Deposition Exhibit 74, marked at the deposition of Michael Elliot taken on May 10, 2022.

23. Attached to this Declaration as Exhibit V is a true and correct copy of Deposition Exhibit 76, marked at the deposition of Michael Elliot taken on May 10, 2022.

24. Attached to this Declaration as Exhibit W is a true and correct copy of Deposition Exhibit 12, marked at the deposition of George Hank taken on April 27, 2022.

25. Attached to this Declaration as Exhibit X is a true and correct copy of Deposition Exhibit 22, marked at the deposition of Tag Evers taken on April 28, 2022.

26. Attached to this Declaration as Exhibit Y is a true and correct copy of Deposition Exhibit 25, marked at the deposition of Tag Evers taken on April 28, 2022.

27. Attached to this Declaration as Exhibit Z is a true and correct copy of Deposition Exhibit 24, marked at the deposition of Tag Evers taken on April 28, 2022.

28. Attached to this Declaration as Exhibit AA is a true and correct copy of Deposition Exhibit 26, marked at the deposition of Tag Evers taken on April 28, 2022.

29. Attached to this Declaration as Exhibit BB is a true and correct copy of Deposition Exhibit 5, marked at the deposition of George Hank taken on April 27, 2022.

30. Attached to this Declaration as Exhibit CC is a true and correct copy of Deposition Exhibit 84, marked at the deposition of Michael Elliot taken on May 10, 2022.

31. Attached to this Declaration as Exhibit DD is a true and correct copy of Deposition Exhibit 83, marked at the deposition of Michael Elliot taken on May 10, 2022.

32. Attached to this Declaration as Exhibit EE is a true and correct copy of Deposition Exhibits 81 and 82, marked at the deposition of Michael Elliot taken on May 10, 2022.

33. Attached to this Declaration as Exhibit FF is a true and correct copy of Deposition Exhibit 86, marked at the deposition of Michael Elliot taken on May 10, 2022.

34. Attached to this Declaration as Exhibit GG is a true and correct copy of Deposition Exhibit 87, marked at the deposition of Michael Elliot taken on May 10, 2022.

35. Attached to this Declaration as Exhibit HH is a true and correct copy of Deposition Exhibit 33, marked at the deposition of Tag Evers taken on April 28, 2022.

36. Attached to this Declaration as Exhibit II is a true and correct copy of Deposition Exhibit 89, marked at the deposition of Michael Elliot taken on May 10, 2022.

37. Attached to this Declaration as Exhibit JJ is a true and correct copy of Deposition Exhibit 90, marked at the deposition of Michael Elliot taken on May 10, 2022.

38. Attached to this Declaration as Exhibit KK is a true and correct copy of Deposition Exhibit 93, marked at the deposition of Michael Elliot taken on May 10, 2022.

39. Attached to this Declaration as Exhibit LL is a true and correct copy of Deposition Exhibit 48, marked at the deposition of Michael Elliot taken on May 10, 2022.

40. Attached to this Declaration as Exhibit MM is a true and correct copy of Deposition Exhibit 2, marked at the deposition of George Hank taken on April 27, 2022.

41. Attached to this Declaration as Exhibit NN is a true and correct copy of Defendants' Response to Plaintiff Edgewood High School of the Sacred Heart, Inc.'s Requests for Admission.

42. Attached to this Declaration as Exhibit OO is a true and correct copy of Deposition Exhibit 46, marked at the deposition of Matthew Tucker taken on April 29, 2022.

43. Attached to this Declaration as Exhibit PP is a true and correct copy of Deposition Exhibit 50, marked at the deposition of Michael Elliot taken on May 10, 2022.

44. Attached to this Declaration as Exhibit QQ is a true and correct copy of Deposition Exhibit 94, marked at the deposition of Michael Elliot taken on May 10, 2022.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 20th day of May, 2022.

/s/ Sarah A. Zylstra

Sarah A. Zylstra

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